

24 June 2019



Australian Energy Market Operator
GPO Box 2008
Melbourne VICTORIA 3001

NEM.Retailprocedureconsultations@aemo.com.au

Dear Sir/Madam

Energy Queensland submission to Metering ICF Package

Energy Queensland welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on the first stage of consultation for the package of ICF changes to metering procedures.

Energy Queensland's comments on the proposed changes to metrology documents are provided in the attached participant response template.

Should AEMO require additional information or wish to discuss any aspect of Energy Queensland's submission, please contact me on (07) 3851 6787 or Peter Wall on (07) 3664 4968.

Yours sincerely

A handwritten signature in cursive script that reads "Trudy Fraser".

Trudy Fraser
Manager - Policy and Regulatory Reform

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Enc: Energy Queensland comments on the changes to Metering Procedures

METERING ICF PACKAGE CHANGES

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Energy Queensland

Submission Date: 24 June 2019

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the initial draft procedures associated with the Metering ICF Package Changes consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO's Retail Electricity Market Procedures and the following proposed changes by proponents and AEMO to implement recommended process improvements.

2. MSATS Procedures: CATS

Section	Description	Participant Comments
2.1.(l)	New section added to clarify the communication of the identification of incorrect NMI	Energy Queensland supports the proposed change but considers that the change would be enhanced with the inclusion of 'promptly' prior to 'cooperate' as we regularly do not receive timely responses to these sorts of issues from other parties.
2.4.(c)	Updated to define timeframes for updating datastreams in MSATS	Energy Queensland supports the proposed change and offers no further comment.
2.4.(d)	Updated to define timeframes for updating datastreams in MSATS	Energy Queensland supports the proposed change and offers no further comment.
2.4.(e)	Updated to define timeframes for updating datastreams in MSATS	Energy Queensland supports the proposed change and offers no further comment.
2.4.(f)	Updated to define timeframes for updating	Energy Queensland supports the proposed change and offers no further

Section	Description	Participant Comments
	datastreams in MSATS	comment.
2.4.(h)	Updated to define timeframes for updating datastreams in MSATS	Energy Queensland supports the proposed change and offers no further comment.
2.5.(a)	New section added to define the dates MPs must use when updating MSATS about remote de-energisations	Energy Queensland supports the proposed change and offers no further comment.
2.5.(b)	New section added to define the dates MPs must use when updating MSATS about remote re- energisations	Energy Queensland supports the proposed change and offers no further comment.
4.18	Updated to clarify the LNSP's obligations in relation to creating Embedded Network Codes and ENM's obligations in relation to application of the Embedded Network Code and data provided to AEMO upon appointment.	Energy Queensland supports the proposed change and offers no further comment.

3. MSATS Procedures: WIGS

Section	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures	Energy Queensland supports the proposed change and offers no further comment.

4. Metrology Procedure: Part A

Section	Description	Participant Comments
3.1.(a)	Update to remove the word 'relevant'	Energy Queensland supports the proposed change and offers no further comment.
3.1.(b)	Update to remove the word 'relevant'; add requirements of AS60044.3 or IEC61869.1 and IEC61869.2; and detail what each topic the part of the standard covers	Energy Queensland supports the proposed change and offers no further comment.
3.1.(c)	Update to remove the word 'relevant'; add requirements of IEC61869.1 and IEC61869.3; and detail what each topic the part of the standard covers	Energy Queensland supports the proposed change and offers no further comment.
3.1.(d)	Update to include International Standards covered in 3.1.(b) and 3.1.(c).	Energy Queensland supports the proposed change and offers no further comment.
12.5.(a)	Removal of obsolete standard AS2490	Energy Queensland supports the proposed change and offers no further comment.
12.5.(b)	New section added to detail Sample Test Plan settings	Energy Queensland supports the proposed change and offers no further comment.
12.5.(c)	New section added to specify when a test sample is deemed to have passes the	Energy Queensland supports the proposed change and offers no further

Section	Description	Participant Comments
	verification test	comment.
12.5.(d)	New section added to specify when the steps to be followed after each round of verification	Energy Queensland supports the proposed change and offers no further comment.
12.5.(e)	Update to specify that verification tests must be conducted at least one every 12 months	Energy Queensland supports the proposed change and offers no further comment.

5. Metrology Procedure: Part B

Section	Description	Participant Comments
2.6	Update to include additional substitution type 69	Energy Queensland supports the proposed change and offers no further comment.
5.3.9	Addition of substitution type 69: Linear Interpolation	Energy Queensland supports the proposed change. However, we question whether ADL or ADC should be used in this calculation given the other Accumulation metering substitution methodologies use ADC in their calculations.

6. Service Level Procedure Meter Data Provider Services

Section	Description	Participant Comments
2.4.1.(ix)	New section added to define an obligation to activate datastreams when energy is recorded from a metering installation while the NMI status is not Active	Energy Queensland supports the proposed change to data stream activity noting the benefit to the timely provision of data.
2.4.1.(x)	New section added to define an obligation to deliver validated metering data to market participants when datastreams are active	Energy Queensland supports the proposed change to data stream activity noting the benefit to the timely provision of data.
4.2.(g)	Amend outdated rule reference	Energy Queensland supports the proposed change and offers no further comment.
6.4.1.(c)	Amend outdated rule reference	Energy Queensland supports the proposed change and offers no further comment.
7.3.(b)	Amend outdated rule reference	Energy Queensland supports the proposed change and offers no further comment.

7. Service Level Procedure Meter Provider Services

Section	Description	Participant Comments
4.2.(a)(iii)	Amend outdated rule reference	Energy Queensland supports the proposed change and offers no further comment.
5.2.(a)	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Energy Queensland supports the proposed change and offers no further comment.

8. Service Level Procedure Embedded Network Manager

Section	Description	Participant Comments
2.1.2.(d)	New section added to define an obligation that the EN for which the ENM has been appointed has an exemption by the AER.	Energy Queensland supports the proposed change and offers no further comment.
4.2.1.	Updated to clarify ENM's obligations with respect to DLFs.	Energy Queensland supports the proposed change and offers no further comment.
4.2.2.	Updated to clarify ENM's obligations with	Energy Queensland supports the proposed change and offers no

Section	Description	Participant Comments
	respect to DLFs.	further comment.
4.3.3.(a)	Updated to clarify ENM's obligations with respect to Network Tariff Codes.	Energy Queensland supports the proposed change and offers no further comment.

9. Exemption Procedure Meter Installation Malfunctions

Section	Description	Participant Comments
1.1.	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Energy Queensland supports the proposed change and offers no further comment.
2.2.	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Energy Queensland supports the proposed change and offers no further comment.
Appendix A	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and rectification.	Energy Queensland supports the proposed change and offers no further comment.
Appendix B	Updated to incorporate additional clause reference for timeframes for metering installation malfunction identification and	Energy Queensland supports the proposed change and offers no further comment.

Section	Description	Participant Comments
	rectification.	

10. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Are there better options to accommodate the change proposals, that better achieve the required objectives? What are the pros and cons of these options? How would they be implemented?	Energy Queensland offers no comment.
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	Energy Queensland offers no comment.